

1 NATHAN R. REINMILLER, ESQ.
2 Nevada Bar No. 6793
3 ALVERSON, TAYLOR,
4 MORTENSEN & SANDERS
5 7401 W. Charleston Boulevard
6 Las Vegas, NV 89117
7 Tel: (702) 384-7000
8 Fax: (702) 385-7000
9 Attorney for Defendants
10 PATRICIA L. HOUGH, M.D.;
11 DAVID L. FREDRICK;
12 ASSOCIATION OF AMERICAN
13 INTERNATIONAL MEDICAL GRADUATES, INC.,
14 SABA UNIVERSITY SCHOOL OF MEDICINE
15 FOUNDATION, EDUCATION INFORMATION
16 CONSULTANTS, INC., EDUCATIONAL
17 INTERNATIONAL CONSULTANTS, LLC, and
18 PANKAJ DESAI, M.D.

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 *-*

22 ST. MATTHEW'S UNIVERSITY) Case No.: CV-S-05-0848-RCJ(LRL)
23 (CAYMAN) LTD., a Cayman Islands company,)
24)
25 Plaintiff,)
26)
27 vs.)
28)
29 SABA UNIVERSITY SCHOOL OF)
30 MEDICINE FOUNDATION, a Netherland-)
31 Antilles company; MEDICAL UNIVERSITY)
32 OF THE AMERICAS, a St. Kitts & Nevis)
33 company; EDUCATION INFORMATION)
34 CONSULTANTS, INC., a Massachusetts)
35 corporation; EDUCATIONAL INTERNATIONAL)
36 CONSULTANTS, LLC, a Massachusetts)
37 limited liability company; PATRICIA L. HOUGH,)
38 M.D. an individual, and d.b.a. "Saba University)
39 School of Medicine"; DAVID L. FREDRICK, an)
40 individual; PANKAJ DESAI, M.D., an individual;)
41 ASSOCIATION OF AMERICAN)
42 INTERNATIONAL MEDICAL GRADUATES,)
43 INC., a Nevada corporation, a.k.a.)

1 "aaimg@yahoo.com"; THOMAS MOORE, M.D.)
2 a.k.a. "presaaimg@hotmail.com" and)
3 "crocdoc2004@netzero.net," an individual;)
4 SARAH B. WEINSTEIN a.k.a.)
5 "execsecaaimg@hotmail.com," an individual;)
6 RACHAEL E. SILVER, an individual; and)
7 DIEDRE MOORE, an individual,)
8)
9 Defendants.)

JOINT MOTION TO EXTEND STAY OF ALL PROCEEDINGS

9 Plaintiff in the above-captioned matter, St. Matthew's University (Cayman), Ltd.
10 ("SMU"), and appearing defendants Saba University School of Medicine Foundation ("Saba
11 University"); the Association of American Medical School Graduates, Inc. ("AAIMG"),
12 Education Information Consultants, Inc. ("EIC, INC."); Educational International Consultants,
13 LLC ("EIC, LLC"), David L. Fredrick, Patricia L. Hough, M.D., and Pankaj Desai, M.D. (the
14 "Appearing Defendants"), (together, the "Parties"), hereby jointly request this Court to extend its
15 previous order staying all actions in light of pending settlement discussions, until and including
16 February 9, 2007, in accordance with the form of proposed order submitted herewith. In support
17 of this motion, the Parties respectfully represent as follows:
18

1. SMU filed the within action in the United States District Court for the District of
2 Nevada captioned St. Matthew's University (Cayman) Ltd v. SABA University School of
3 Medicine Foundation et al, Civil Action No. CV-S-05-0848-RCJ(LRL) (the "Litigation"), and
4 have been actively engaged in the prosecution of the claims and defenses presented in the
5 Litigation since the inception of this matter;

25 2. The Parties have determined that it is their mutual best interest to engage in good
26 faith settlement discussions with the goal of finally resolving and settling, once and for all, and
27 all of the claims and defenses presented in the Litigation on terms that are fair and just to all
28

Parties;

1 3. In furtherance of this goal, the Parties wish to avoid the substantial cost and
2 expense associated with continuing with this Litigation during the time that the Parties will be
3 actively engaged in good faith settlement discussions;

4 4. The Parties represent that they have entered into a written standstill agreement
5 pursuant to the terms of which each party to this Litigation has agreed, subject to this Court's
6 approval, to suspend all further activities in connection with the prosecution or defense of this
7 matter, including, without limitation, the filing of any motions, discovery, subpoena or service
8 upon or the addition any Parties to the Litigation;

9 5. The Parties have additionally agreed agree that they will not commence or
10 prosecute, or cause to be commenced or prosecuted, any new or existing litigation between any
11 of the Parties in any jurisdiction prior to the termination date of any stay entered by the Court in
12 this matter;

13 6. The Parties have been actively engaged in good faith discussions regarding a
14 resolution of this matter during the stay ordered by the Court and have made substantial progress
15 toward a resolution of this matter. The Parties respectfully represent that an extension of the stay
16 until February 9, 2007 will afford the Parties the additional time needed to conclude their
17 discussions;

18 7. The Parties further represent that no party to this Litigation will be prejudiced by
19 the requested stay, and that the requested stay will serve the interests of conserving judicial
20 resources.

21 8. The Parties have further agreed that neither the filing of this joint motion nor the filing
22 of any previous joint motion shall be deemed to operate as or effect a waiver of any claims or
23 defenses that any party was entitled to or has asserted prior to the filing of this or any previous
24 joint motion to stay, including, without limitation, any and all defenses based on lack of personal

jurisdiction.

1 WHEREFORE, the Parties respectfully request that this Court enter an order extending
2 the previous stay to and including February 9, 2007 upon the terms and conditions reflected in
3 the attached proposed form of Order.
4

5 RESPECTFULLY SUBMITTED:
6

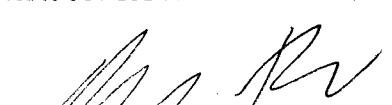
7 Dated: 2 Feb, 2007

8 GREENBERG TRAURIG, LLP

9 By: 
10 Mark G. Tratos, Esq.
11 F. Christopher Austin, Esq.
12 Ronald D. Green, Jr., Esq.
13 GREENBERG TRAURIG, LLP
14 3773 Howard Hughes Parkway, Ste. 500 N
15 Las Vegas, Nevada 89109
16 Tel: 702-792-3773
17 Counsel for Plaintiff ST. MATTHEW'S UNIVERSITY
18 (CAYMAN), LTD.

19 Dated: 2 Fev, 2007

20 ALVERSON TAYLOR MORTENSEN & SANDERS

21 By: 
22 Bruce A. Alverson, Esq.
23 Nathan Reinmiller, Esq.
24 ALVERSON TAYLOR MORTENSEN & SANDERS
25 7401 West Charleston Blvd.
26 Las Vegas, Nevada 89117
27 Tel.: 702-384-7000
28 Counsel for Defendants
ASSOCIATION OF AMERICAN INTERNATIONAL
MEDICAL GRADUATES, INC., SABA UNIVERSITY
SCHOOL OF MEDICINE FOUNDATION, LTD.,
MEDICAL UNIVERSITY OF THE AMERICAS,
EDUCATION INFORMATION CONSULTANTS, INC.,
EDUCATIONAL INTERNATIONAL CONSULTANTS,
LLC, PATRICIA L. HOUGH, M.D., DAVID L.
FREDRICK, and PANKAJ DESAI, M.D.

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I hereby certify that I am an employee of ALVERSON, TAYLOR, MORTENSEN & SANDERS and that on the 2 day of February, 2007 I caused to be served a true and correct copy of the document described herein via Case Management/Electronic Case Filing, and addressed to the following:

Document Served:

***JOINT MOTION TO EXTEND STAY OF ALL
PROCEEDINGS***

Person(s) Served:

10 Karl S. Kronenberger, Esq.
11 Terri R. Hanley, Esq.
12 KRONENBERGER BURGOYNE, LLP
13 150 Post Street, Suite 520
San Francisco, CA 94018-4707
Attorney for Plaintiff

14 Mark G. Tratos, Esq.
15 F. Christopher Austin, Esq.
16 Ronald D. Green, Esq.
17 3773 H. Hughes Parkway, Suite 500N
Las Vegas, NV 89169
Attorneys for Plaintiff

A.K. Dela Cruz
An Employee of Alverson, Taylor, Mortensen & Sanders